California Energy Commission Application For Certification Pursuant To The 21 Day Emergency Permitting Process

1.0 Project Description

1.2 Overview of Power Plant and Linear Facilities

The project is a nominally rated 180 megawatt (MW) power plant that will utilize four natural gas-fired combustion turbine generators equipped with state-of-the-art air pollution control features. The project will utilize GE LM6000 aeroderivative combustion turbine-generators, which have been installed in hundreds of facilities throughout the world. The facility will be configured in a simple cycle mode.

A fogging/evaporation system will be used to increase efficiency and output. At a later date, an inlet air chilling system (R134 refrigerant and chilled water heat exchange medium) will be added to further increase efficiency and output.

The lube oil systems will be cooled by shell and tube heat exchangers via an evaporative fin-fan cooler. The generators will be air-cooled.

To reduce nitrogen oxide (NO_x) emissions from the project, a water injection system will initially be used, and later supplemented by selective catalytic reduction (SCR) technology. Demineralized water will be injected into the combustors of the combustion turbines to help reduce NO_x to 25 ppm. This method is a reliable and proven method to reduce NO_x emissions. Demineralized water will also be used for intercooling of the combustion turbine compressors to increase power output during high ambient temperature conditions.

The SCR will ultimately be located in the turbine exhaust. The system is considered a best available control technology (BACT) and is a reliable and proven technology to further reduce NO_x emissions to 5 ppm. The system works by injecting ammonia vapor (NH₃) into the flue gases, which then pass through a catalyst material. The resulting chemical reaction reduces the NO_x to harmless nitrogen and water. The catalyst material will be of a precious metal (e.g., titanium-vanadium) or zeolite type, neither of which is considered a hazardous material.

An oxidation-reduction catalyst of a precious metal type (e.g., titanium-vanadium) will ultimately be installed to reduce CO levels to 6 ppm and volatile organic compounds (VOC) to 2 ppm. The catalyst is not considered a hazardous material. An emissions monitoring system will be provided to continuously monitor and record NO_x , CO, SO_2 , and NH_3 slip.

Aqueous ammonia will be delivered several times per month to the site via a tanker truck regulated by the California Department of Transportation (CalTrans). The ammonia will be stored onsite in an aboveground tank which will be housed inside a secondary concrete containment unit. The containment will be designed to retain a minimum of 110 percent of the storage tank volume. The ammonia storage tank will be designed for a pressure of 50 psig. In addition, polypropylene balls and netting will be used in the secondary containment area to reduce the exposed surface area in the event of a catastrophic tank failure.

An ammonia flow control system will be used to regulate the use of ammonia. Vaporization skids will be used to heat the ammonia and inject it into the SCR systems or an alternate arrangement of direct injection into the turbine exhaust may be used.

In addition to the primary oil containment measures of the combustion turbines, a secondary containment system (deck and curbs) will be used with each combustion turbine to hold any accidental releases of lube oil. The secondary containment will hold a minimum of 110 percent of the oil capacity of a combustion turbine.

Secondary containment will be provided around each oil-filled transformer and will be designed to contain a minimum of 110 percent of the oil capacity of the transformer. In addition, a secondary containment system will be provided around each gas compressor and will be designed to contain 110 percent of the lube oil capacity of each compressor. Also, secondary containment systems will be used with the diesel driven fire pump and associated diesel fuel oil tank (approximately 250 gallons) as well as miscellaneous pumps and compressors containing oil. Secondary containment areas subject to rain will employ sumps and portable pumps to remove rain water to the storm drainage system.

The project will cover an area of roughly 11 acres of land. Except for the approximately 110 foot stack for each of the four combustion turbines and miscellaneous vents, the project components are less than 50 feet in height.

The project will obtain potable water from the City of Chino. City of Chino currently supplies water to the OLS Energy - Chino cogeneration facility via an existing water line. The Applicant understands that the OLS Energy - Chino facility may have sufficient water supply capacity to service its own needs as well as the domestic needs of the project. The Applicant has contacted the City of Chino to confirm that this is the case and has discussed with OLS Energy the possibility of tapping into the OLS Energy - Chino facility's water supply line.

Reclaim water will be used to serve the process water requirements for the project. A new reclaim water supply line will be installed to serve the project. The new line will run west from the project site to an interconnection point near the intersection of Eucalyptus and Central Avenues.

The project will store water in an approximately 500,000 gallon aboveground service water tank that also serves as an alternate source for fire water. The project will consume about 360 gallons per minute (gpm) of water at peak usage.

Demineralized water will be provided via a portable ion exchange system used to treat water provided from the service water tank and will be stored in an aboveground tank. Recharging of ion exchangers used to treat the service water will be done offsite. Alternatively, a combination of reverse osmosis (RO) and ion exchange may be utilized. In this case, approximately 150 gpm of RO reject will be routed to the existing OLS facility to provide cooling tower makeup.

Southern California Gas (SoCal Gas) will provide the gas interconnection from its intrastate pipeline at a point located near the intersection of Central Avenue and Eucalyptus Avenue, about 1,800 feet west of the plant site. The route of the new gas pipeline is expected to be on CIM property along the right-of-way used for the service to the existing OLS Energy - Chino cogeneration facility. The gas pipeline will have a capacity of approximately 60 MMcfd.

The 230 kV transmission line will interconnect with Southern California Edison's 230 kV Chino substation approximately 1,950 feet north-northeast of the project site. The proposed line will be underground and will interconnect the project with the substation. An approximate transmission line route is provided in Attachment 10.

Site storm drainage will be to the storm water system. Plant drains will be routed to either special tanks/sumps or to separate separation sumps, with provisions for oil collection by an oil/water separator. Any oil sludge will be properly disposed of at an appropriate waste disposal or recycling facility. Other plant liquid wastes collected in special tanks/sumps will be disposed of properly at a waste disposal or a recycling facility. Sewage will be discharged to the OLS Energy - Chino cogeneration facility. If RO technology is utilized in the production of NO_x/power augmentation water, RO reject may be routed to the Inland Empire Industrial Wastewater System in the event the existing OLS cooling tower cannot accept makeup water.

The project will include a construction staging and maintenance area located immediately adjacent to the site. This staging area will be used during the construction phase of the project for parking vehicles and for the storage of materials and equipment.

1.3 Structure Dimensions (Size and Height), Plan, and Profile

The size of the facility is compact and consists of modular components. With the exception of combustion turbine exhaust stacks and miscellaneous vents, the facility components are less than 50 feet in height and will occupy approximately 11 acres. Refer to Attachment 1 for a plan view of the proposed facility and Attachment 2 for an elevation view.

1.7 Proposed Operation (Hours Per Year)

The project is designed as a peaking unit. It will be permitted for up to 7,500 hours of operation per year to allow for maximum flexibility. However, it is anticipated that the project will operate less than 2,500 hours per year. Atmospheric emissions will be evaluated accordingly.

1.8 Expected On-line Date

The first three units of the project are expected to be on-line and ready for commercial operation on September 30, 2001. The on-line date could be delayed by 7 to 10 days due to relocation of the project site to address biological concerns. The fourth unit is expected to be on-line by March 31, 2002. In the event of delays in the gas and electric interconnection process, the initiation of commercial operation could be delayed.

Milestone dates associated with project construction are as follows:

- Start of construction (mobilization)--June 18, 2001.
- First concrete pour--July 2, 2001.
- Initial startup (startup manager is onsite)--July 16, 2001.
- Foundations complete--August 13, 2001.
- Turbine delivery (Units 1 and 2)--June 27, 2001.
- Turbine delivery (Unit 3)--July 2, 2001.
- Turbine delivery (Unit 4)--December 31, 2001.
- Commercial on-line (Units 1, 2, and 3)--September 30, 2001.
- Commercial on-line (Unit 4)--March 31, 2002.

1.10 Identification of Transmission Interconnection Facilities

The project is located about 1,950 feet south-southwest of SCE's 230 kV Chino substation. The project will interconnect with the Chino substation via a new underground 230 kV transmission line. The proposed line will be a direct interconnection between the project and the Chino substation.

1.13 Fuel Interconnection Facilities

Southern California Gas will provide the gas interconnection from its intrastate pipeline at a point located near the intersection of Central Avenue and Eucalyptus Avenue, roughly 1,800 feet west of the plant site. The route of the new gas pipeline is expected to

be on CIM property along the right-of-way used for the service to the existing OLS Energy - Chino cogeneration facility. The gas pipeline will have a capacity of approximately 60 MMcfd.

SoCal Gas's proposal and schedule for the gas supply installation are included as part of Attachment 6.

2.0 Site Description

2.1 Site Address (Street, City, County)

The project site is adjacent to and north of the OLS Energy - Chino cogeneration facility. The address of the OLS Energy - Chino facility is 5601 Eucalyptus Avenue, Chino, San Bernardino County, CA 91708.

The project site is located on property owned by the State of California on portions of Lots 49 and 64 of Section 14, and portions of Lots 56 and 57 of Section 13, Township 2 South, Range 8 West, of Subdivision Rancho Santa Ana Del Chino in San Bernardino County. The site is located adjacent to the CIM day labor facilities and north of the OLS Energy - Chino cogeneration facility and is bounded by Eucalyptus Avenue on the south. The western and eastern boundaries are roughly 1,800 feet and 2,650 feet east of Central Avenue, respectively. The site is 750 feet east to west and 650 feet north to south.

The City of Chino will not assign an address to the facility until a structure is onsite.

2.2 Assessor's Parcel Number

The County of San Bernardino has indicated that there is no tax assessor's parcel number for the project site since it is located on state property. However, the following property description was provided by the County of San Bernardino: portions of Lots 49 and 64 of Section 14, and portions of Lots 56 and 57 of Section 13, Township 2 South, Range 8 West of Subdivision Rancho Santa Ana Del Chino in the County of San Bernardino, State of California, as described in the office of the recorder of San Bernardino County.

2.3 Names and Addresses of All Property Owners Within 500 Feet of the Project Site or Related Facilities

The following list includes the names and addresses of all property owners within 500 feet of the project site and linear facilities. An electronic mail merge format will be submitted to the CEC under separate cover:

- OLS Energy Chino, 5601 Eucalyptus, Chino, CA 91708.
- State of California, Department of General Services, 717 K Street, Suite 409, Sacramento, CA 95814-3406.

- TDN Land Co., 5211 Edison Ave., Chino, CA 91710.
- Larry Barrios, Jr. and Carmen Barrios, 14450 Central Avenue, Chino, CA 91710.
- American Eagle Wheel Corp., 5780 Soestern Court, Chino, CA 91710.
- Pico Property Investments, 4811 S. Eastern Avenue, Bell, CA 90201.
- City of Chino Hills, 2001 Grand Avenue, Chino Hills, CA 91709.
- Chino Valley YMCA, 5665 Edison Avenue, Chino, CA 91710.
- Southern California Edison Company, LTD, c/o Charles Alderette, 430 N. Vineyard Avenue, Suite 210, Ontario, CA 91764.

2.4 Existing Site Use

The entire plant site is presently open field. No existing land uses have been identified on the site.

The 230 kV transmission line will interconnect with SCE's 230 kV Chino substation approximately 1,950 feet north-northeast of the project site. The new transmission line will run underground and will connect the project to the substation.

The water and gas lines will be located onsite and will extend to the west on CIM property along an existing dirt road (Eucalyptus Avenue). The water line will tie into the municipal water supply line near the intersection of Eucalyptus Avenue and Central Avenue. The gas line will tie into Southern California Gas's intrastate pipeline system at a point near the intersection of Central Avenue and Eucalyptus Avenue, approximately 1,800 feet west of the plant site.

2.5 Existing Site Characteristics (Paved, Graded, etc.)

The project site currently consists of an open field.

2.6 Layout of Site (Including Plot Plan)

The project will be constructed within an 11 acre site which includes four combustion turbine generators, four SCR modules, four exhaust stacks, two modular control structures, and a facility substation which includes two generator step-up transformers, two auxiliary transformers, and four generator circuit breakers. A new 230 kV underground transmission line will be installed to interconnect the project with SCE's 230 kV Chino substation. Refer to Attachment 1 for a site arrangement drawing.

2.9 Status of Site Control

The project has executed a lease agreement with the State of California Department of General Services.

2.10 Equipment Laydown Area - Size and Location

The project will use approximately 2 acres within the project site for equipment laydown and approximately 5 acres immediately east of the project site for craft parking, construction trailers, construction trailer parking, and pipe fabrication activities.

5.0 Air Emissions

5.5 Status of Offsets and/or Mitigation Fees, As Required

Based on 7,500 hours of operation per year as detailed in the Permit to Construct Application submitted under separate cover, the project will be required to acquire the following offsets:

- NO_x --Up to 960 lb/day.
- CO--Up to 1,445 lb/day.
- SO_2 --Up to 34 lb/day.
- PM_{10} --Up to 331 lb/day.

Based on current negotiations for the power purchase agreement, it is anticipated the project will operate less than 2,500 hours per year. Once this agreement is finalized, appropriate offsets will be obtained.

The Applicant is currently working with several emissions offset brokers to obtain the required NO_x credits. Because of the relative scarcity of PM_{10} ERCs presently available for purchase within the SCAQMD, the needed quantity of ERCs for this pollutant will be obtained using one or more of the following strategies:

- Having brokers obtain the necessary PM₁₀ credits.
- Having brokers obtain SO_x ERCs to be used at the 2:1 ratio accepted by SCAQMD.
- Developing a mitigation project or projects with appropriate entities to create the required PM₁₀ ERCs.

In addition, the Applicant will investigate the possibility of purchasing credits to offset project emissions of all pollutants from the California Air Resources Board pursuant to Governor Davis' recent Executive Orders.

6.0 Noise

6.1 Local Noise Requirements

The City of Chino Noise Ordinance indicates the exterior sound level at any residence must not exceed 55 dBA during daytime hours (7 a.m. - 10 p.m.) and 50 dBA during nighttime hours (10 p.m. - 7 a.m.) at residential locations. The ordinance does not include specific noise criteria for commercial, industrial, or public land uses. The ordinance also indicates that any area in which the existing ambient sound level exceeds the noise requirements stated above, the noise requirements will be increased to equal the existing ambient level.

An existing cogeneration facility is located on the property adjacent to the proposed site. In addition, large air handling units are located adjacent to the prison buildings and a Woodshop Cyclone Unit located within the vicinity. Measurements were conducted approximately 80 feet from the prison buildings (closest accessible point) with the existing cogeneration unit operating continuously, and the woodshop cyclone unit in barracks air conditioners operating intermittently. Measured hourly Leq sound levels ranged from a high of 61 dBA during the day to a low of 51 during early morning hours (3:00 a.m.). Sound levels from the air conditioning units were measured to be 60 dBA at 50 feet from the equipment. This equipment is adjacent to the barracks buildings. Sound levels at 10 feet from these units are estimated to be 70 to 75 dBA. Therefore, sound levels directly outside the barracks are approximately 70 dBA with the air conditioning units operating and approximately 50 dBA without the air conditioning units operating.

Existing sound levels at Ayala Park and the nearest residence are generally controlled by traffic noise along Eucalyptus Avenue. Measured sound levels are generally in the high 50's and low 60's during the daytime and mid 40's during nighttime and early morning hours.

6.2 Nearest Sensitive Receptor (Type, Distance)

The nearest sensitive receptors are the CIM staff and inmates, the closest of which are housed in barracks approximately 900 feet south of the site. The nearest residential locations are approximately 3/4 of a mile northeast of the facility. The closest commercial use is located approximately one mile west of the site.

6.3 Project Noise Level at Nearest Property Line

The facility noise emissions are projected to be approximately 60 dBA at the barracks south of the site. This sound level is consistent with the levels measured while the existing barracks air conditioning units are in operation.

Sound levels at Ayala Park are predicted to be 57 dBA. These levels are consistent with the daytime sound levels measured in the vicinity of the park.

Sound levels at the nearest residence are projected to be 46 dBA. These levels will satisfy the Chino Ordinance criteria and will be consistent with the existing ambient sound levels.

All sound levels are based on 4 units operating at base load simple cycle operation.

6.4 Proposed Mitigation if Required

For protection of the CIM staff and inmates, the applicant will include extensive noise mitigation into the facility design. The combustion turbine equipment will be housed in acoustic enclosures; the turbine inlet, exhaust will be equipped with silencers; and gas compressor equipment will be located within an enclosure.

8.0 Biological Resources

8.1 Legally Protected Species and Their Habitat Onsite and Along Linear Facilities

The project site and associated linear facilities are located entirely in areas that have been previously cleared or otherwise severely disturbed to the point that natural plant communities no longer exist on them. The plant site and linear facilities consist of cultivated fields or previously disturbed land now occupied by weedy, non-native vegetation. The project site and associated linear facilities have been sited to minimize impacts to wildlife. In addition, the proposed project will have minimal effect on the movement of any type of terrestrial or aquatic wildlife. Attachment 9 includes agency correspondence regarding protected species inquiries.

8.2 Legally Protected Species and Their Habitat Adjacent to Site and Along Linear Facilities

The proposed transmission line and gas pipeline cross severely disturbed land that is either cultivated or occupied by plant communities dominated by herbaceous, non-native, weedy species. Burrowing owls have been confirmed as occurring in the vicinity of the transmission line. However, appropriate mitigation measures have been discussed and agreed upon with the resource agencies and will be implemented to avoid impacts to wildlife, particularly burrowing owls.

8.4 Proposed Mitigation (If Required)

The Applicant, the CEC, and the resource agencies have discussed and agreed upon measures for mitigating project-related impacts to wildlife, particularly burrowing owls. These measures will be implemented and are expected to appropriately mitigate any potential project impacts to burrowing owls and other wildlife.

9.0 Land Use

9.2 Use of Adjacent Parcels

The project is bounded on the north and east by vacant property, on the south by the OLS Energy - Chino cogeneration facility, and on the west by CIM day labor facilities. Refer to Attachment 10 for a map of local land uses.

11.0 Traffic and Transportation

11.1 Level of Service (LOS) Measurements on Surrounding Roads - A.M. and P.M. Peaks

Through negotiations with the State of California, the Applicant has arranged access to the site via the eastern gate on Eucalyptus Avenue. For delivery of heavy haul loads, the gate located at Central Avenue and Eucalyptus Avenue will be used. Regional access to the project site is via SR 60, which runs east-west and is located north of the site, and SR 71, which runs diagonally northwest-southeast and is located west of the project site. Direct access to the site is provided by Grand/Edison Avenue, Euclid Avenue, and Eucalyptus. West of Euclid Avenue, Eucalyptus is used primarily as an access road to CIM and receives little public traffic. Public use stops approximately 2 blocks west of Euclid, at San Antonio. West of San Antonio, Eucalyptus carries prison traffic only.

It is anticipated that construction traffic will use these roadways to access the project site. As an alternative, construction traffic may also use Central Avenue via Edison Avenue from SR 71. In this case, traffic would travel east on Edison Avenue to Central Avenue, and then south on Central Avenue to Eucalyptus, where the entrance gate is located. All roadways listed above are designated truck routes, as shown in Attachment 12 (City of Chino, Public Works Department, Transportation Division). Traffic counts, LOS, and truck routes associated with the roadways mentioned above, as well as surrounding roadways, are provided in Attachment 12 of this application.

Based on average workforce requirements and vehicle occupancy rates, it is estimated that 278 vehicle trips per day will result from construction traffic. In addition to workforce traffic, an average of 3 to 4 deliveries per day is anticipated during the construction period. Due to the temporary nature of these impacts, and the fact that such impacts will be largely restricted to specific, relatively short time periods, it is not expected that long-term changes in traffic will occur.

It is anticipated that additional security measures will be required at the eastern Eucalyptus access gate to meet the expedited project construction schedule. The Applicant has agreed to assume responsibility for additional costs associated with increased security demand at this entrance gate during the construction period.

Traffic impacts associated with project construction are not expected to be significant. Operation of the project will not result in any significant impacts on traffic.

11.2 Traffic Control Plan for Roads During Construction Period

In order to minimize impacts to traffic flow, the Applicant will develop and implement a standard traffic control plan consistent with the size and scope of the project's construction activities. Such safety measures may include the following:

- Using proper signs and traffic control measures in accordance with Caltrans and City requirements.
- Installing crossing structures to avoid obstructing roads.
- Coordinating construction activities with appropriate City and County departments if closures of major roads are necessary during pipeline construction.
- Coordinating crossing of state highways with Caltrans in accordance with Caltrans regulations and permit requirements.
- Scheduling of traffic lane or road closures during off-peak hours whenever possible.
- Limiting vehicular traffic to approved access roads, construction yards, and construction sites.
- Constructing offsite pipelines in accordance with applicable state and local encroachment permit requirements and covering trenches in roadways during nonwork hours.

In addition, the traffic control plan will address these potential mitigation measures:

- Establishment of construction work hours outside of the peak traffic periods to ensure that construction workforce traffic occurs during off-peak hours.
- Scheduling of the delivery of heavy equipment and building materials by truck during off-peak hours.

A detailed traffic control plan, pursuant to CalTrans, county, and city requirements will be developed and submitted at the request of the CEC.

The Applicant will obtain the appropriate transportation-related permits prior to project construction. In addition, CIM security requirements will be adhered to during project construction. Costs for additional security during construction will be paid for by the Applicant.

11.3 Traffic Impact of Linear Facility Construction

Construction of the natural gas pipeline and the water supply line will occur along Eucalyptus Avenue, running west from the project site to Central Avenue. This stretch of Eucalyptus Avenue is used by the CIM and therefore receives no use from the public. No significant traffic impacts are anticipated from the construction of these utilities.

From the plant, the underground transmission line will extend in a general north-northeast direction to an interconnection point with SCE. The transmission line route is shown in Attachment 10. No significant impacts are anticipated as a result of transmission line construction activities. However, some minor, temporary traffic disruption may be encountered when construction of the line crosses Edison Avenue to the north.

11.4 Equipment Transport Route

Access to the site will be provided via Eucalyptus Avenue off Euclid Avenue in accordance with CIM requirements. Costs for additional security needed during construction will be paid for by the Applicant.

No significant traffic impacts are anticipated from equipment deliveries to the site.

11.5 Parking Requirements - Workforce and Equipment

Parking for construction personnel will be provided within the construction staging area located east of the project site. Construction of the project will require the use and installation of heavy machinery and associated systems and structures. In addition to deliveries of heavy equipment, construction materials such as concrete, pipe, cables, and steel will be delivered to the site by truck. At this time, the types of vehicles and equipment to be used for project construction have not been finalized.

12.0 Water Resources

12.2 Status of Permits for Wastewater Discharge or Draft Permit (WDR/NPDES)

Erosion and sediment controls and other Best Management Practices (BMPs) will be implemented for the construction phase in accordance with the California NPDES General Permit for Storm Water Discharge Associated with Construction Activity and with other local laws and ordinances as applicable. The Notice of Intent for the abovementioned NPDES permit application was submitted in May 2001. A copy is included as part of Attachment 16.

Storm water discharge permits associated with industrial activities during operation will not be required since the existing CIM water treatment facility will serve the project. Wastewater discharge permits will not be required since sewage will be routed to the OLS Energy - Chino cogeneration facility, and process wastewater will be sent to either the OLS Energy - Chino facility or to the Inland Empire Utilities Agency.

12.4 Spill Prevention/Water Quality Protection Plans

In accordance with 40 CFR 112.1 (d) (2), the site does not have aboveground storage capacity for oil that exceeds 1,320 gallons, and no single container has a capacity in excess of 660 gallons; therefore, a Spill Prevention Control and Countermeasure Plan for the facility is not required.

The storage and handling of aqueous ammonia at the site will be covered under the California Accidental Release Program (CalARP). The CalARP will be completed and approved, as appropriate, prior to the introduction of the chemical onsite.

The total area of the site is approximately 11 acres. Therefore, a Storm Water Pollution Prevention Plan (SWPPP) for construction activities will be in place prior to the start of construction. The SWPPP will include a description of BMPs for storm water pollution prevention to be implemented at the site during the construction phase. These BMPs will include but not limited to culverts, berms, sandbags, and other acceptable procedures for the prevention of storm water pollution from onsite materials. The SWPPP will be submitted to the local Regional Water Quality Control Board (RWQCB) for approval.

13.0 Cultural Resources

13.1 Map of Known Historic/Prehistoric Sites

A cultural resources investigation of the affected lands was conducted by Garcia and Associates (San Anselmo, CA). No cultural resources were found on lands to be affected by the proposed project including the project site and associated linears; therefore, no map has been included.

Notification of the project was sent to appropriate agencies requesting comments on the project. Copies of these letters and responses received are included in Attachment 13.

14.0 Paleontological Resources

14.1 Identification of Paleontological Resources

The lands proposed for the project have been subjected to extensive natural and humanrelated surface disturbances for many years. Therefore, the potential for the occurrence of significant, intact paleontological resources appears low. Garcia and Associates (San Anselmo, CA) conducted a survey of the project components (including the project site and associated linear corridors) to ensure that no significant paleontological resources would be affected by the project. No paleontological resources were discovered.

Notification of the project was sent to appropriate agencies requesting comments on the project. Copies of these letters and responses received are included in Attachment 13.